

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SHADEESHA BROWN and GABRIEL PEREZ, :
: **11CV1068(AJN)**
Plaintiffs, :
: - against - :
THE CITY OF NEW YORK, BRIAN McALEAR, :
KEITH HOCKADAY, FREDERICO MARTINEZ, :
JOAQUIN MORALES, ROBERT DOWNES, :
THOMAS ALBANO, GERARD FLOOD, WILLIAM :
HART, TIMOTHY MURPHY, KENYETTA ROUSE, :
and THOMAS LONGA, :
Defendants :
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**DECLARATION OF
EUGENE M. BELLIN**

Eugene M. Bellin, an attorney admitted to practice before the Courts of the State of New York and before this Court, declares, under penalty of perjury, pursuant to 28 U.S.C. §1746, the following:

1. I am of counsel to the firm of Michelstein & Associates, PLLC, attorneys for plaintiff Shadeesha Brown.
2. I respectfully submit this Declaration and the exhibits annexed hereto on behalf of the plaintiffs in support of the Reply Memorandum of Law in support of plaintiff Shadeesha Brown's motion *in limine*.
3. Attached hereto as Exhibit 10 is a copy of relevant portions of the transcript of the deposition of Kenyatta Rouse.
4. Attached hereto as Exhibit 11 is a copy of relevant portions of the transcript of the deposition of Joaquin Morales.

5. Attached hereto as Exhibit 12 is a copy of the title page of the deposition of Kenyatta Rouse.

6. Attached hereto as Exhibit 13 is a copy of the title page of the deposition of Gerard Flood.

7. Attached hereto as Exhibit 14 is a copy of the title page of the deposition of Keith Hockaday.

8. Attached hereto as Exhibit 15 is a copy of the title page of the deposition of Robert Downes.

9. Attached hereto as Exhibit 16 is a copy of the title page of the deposition of Joaquin Morales.

10. Attached hereto as Exhibit 17 is a copy of the title page of the deposition of Fred Martinez.

11. Attached hereto as Exhibit 18 is a copy of the title page of the deposition of Corey Jones.

12. Attached hereto as Exhibit 19 is a copy of the title page of the deposition of Thomas Longa.

13. Attached hereto as Exhibit 20 is a copy of the title page of the deposition of William Hart.

14. Attached hereto as Exhibit 21 is a copy of the title page of the deposition of Thomas Albano.

15. Attached hereto as Exhibit 22 is a copy of the title page of the deposition of Thomas Murphy.

16. Attached hereto as Exhibit 23 is a copy of the title page of the deposition of Brian McAlear.

Dated: April 29, 2013

s/Eugene M. Bellin

Eugene M. Bellin (EB0722)

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